

HOGAN LOVELLS US LLP
Erin N. Brady (CA 215038)
erin.brady@hoganlovells.com
1999 Avenue of the Stars, Suite 1400
Los Angeles, California 90067
Telephone: (310) 785-4600
Facsimile: (310) 785-4601

– and –

M. Hampton Foushee (*pro hac vice*)
hampton.foushee@hoganlovells.com
875 Third Avenue
New York, New York 10022
Tel: (212) 918-3000
Fax: (212) 918-3100

*Counsel for Party in Interest
esVolta, LP.*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

***All papers shall be filed in the Lead Case,
No. 19-30088 (DM)**

Bankruptcy Case
No. 19 – 30888 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION BETWEEN
DEBTORS AND ESVOLTA, LP
EXTENDING TIME TO RESPOND
TO SAFE HARBOR MOTION TO BE
HEARD ON APRIL 10, 2019**

[No Hearing Requested]

This stipulation and agreement for order (“Stipulation and Agreement for Order”) is entered into by esVolta, LP (“esVolta”) on the one hand, and PG&E Corporation and Pacific Gas & Electric Company, as debtors and debtors in possession (collectively, the “Debtors”) on

1 the other. esVolta and the Debtors are referred to in this Stipulation and Agreement for Order
2 collectively as the “Parties,” and each as a “Party.” The Parties hereby stipulate and agree as
3 follows:

4
5 **RECITALS**

6 A. On March 20, 2019, esVolta filed a notice of hearing (the “Notice”) [Dkt. 980]
7 noticing the *Motion and Memorandum of esVolta, LP for Entry of an Order Confirming Safe*
8 *Harbor Protection Under 11 U.S.C. §§ 362(b)(6) and 556* (the “Motion”) [Dkt. 977] for a
9 hearing before the Court at 1:30 p.m. on April 10, 2019.

10 B. Counsel for the Debtors has requested, and counsel for esVolta has agreed, that
11 the time for the Debtors to file any response or opposition to the Motion (any such response or
12 opposition, a “Debtors Response”) be extended.

13 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
14 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
15 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
16 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO**
17 **ORDER, THAT:**

18 1. The time for the Debtors to file and serve any Debtors Response is extended
19 through 4:00 p.m. (Pacific Time) on April 5, 2019.
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Dated: March 29, 2019
HOGAN LOVELLS US LLP
By: /s/ Erin Brady
Erin N. Brady
(CA 215038)
Attorneys for esVolta, LP

Dated: March 29, 2019
WEIL, GOTSHAL & MANGES LLP
By: /s/ Matthew Goren
Matthew Goren
(*pro hac vice*)
Attorneys for Debtors